

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

E-FILED - 7/13/06

In re CONSECO INSURANCE CO. ANNUITY
MARKETING & SALES PRACTICES LITIG.

Case No. C05 04726 RMW
And Related Cases

This Document Relates To:

All Actions.


**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO FILE
MOTION FOR CLASS CERTIFICATION**

The parties hereto, class plaintiffs Robert H. Hansen and Friou P. Jones, on behalf of all other similarly situated persons, and defendant, Conseco Insurance Company ("Conseco") hereby stipulate through their respective attorneys of record, and request that the Court extend the current deadline for plaintiffs to file and serve their motion for class certification, currently set for July 28, 2006, to January 12, 2007. Good cause exists for this request because defendant plans to file a motion to

1 dismiss to the new Consolidated and Amended Class Action Complaint, and Discovery has not yet
2 begun.

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4 DATED: July 12, 2006.

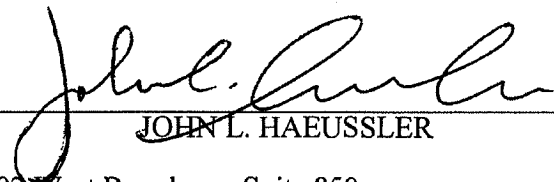
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6 BAKER & MCKENZIE
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7
8 By 
9 Linda B. Oliver
10 Attorneys for Defendant Conseco Insurance
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11 DATED: July 12, 2006.

12
13 Respectfully submitted,

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1 IT IS SO ORDERED. The deadline for plaintiffs' motion for class certification is hereby
2 extended from July 28, 2006 to January 12, 2007.

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4 DATED: 7/13/06

/S/ RONALD M. WHYTE

RONALD M. WHYTE
UNITED STATES DISTRICT JUDGE

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